

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LISA BREWER,)	
)	
Plaintiff,)	Case No. 1:19-cv-04317
v.)	
)	Judge Steven C. Seeger
PC CONNECTION, INC., d/b/a CONNECTION, a)	
CORPORATION, GARRY HICKERSON, JEFF)	
HIROMURA, ED TUCKER, CRAIG LANCE)	
AND RICK GILIGAN,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND CLOSE OF FACT DISCOVERY

Plaintiff Lisa L. Brewer and Defendants PC Connection, Inc., d/b/a Connection, a Corporation, Garry Hickerson, Jeff Hiromura, Ed Tucker, Craig Lance, and Rick Gilligan (together, the “Parties”), by and through their respective attorneys, respectfully move this Court to extend the discovery completion date (currently set for April 21, 2020) to May 21, 2020. In support of this Joint Motion, the Parties state as follows:

1. On June 27, 2019, Plaintiff filed a Complaint against Defendants. (*See* Dkt. No. 1). On November 6, 2019, Defendants filed a Partial Motion to Dismiss Counts I-VII and XIII-XX of Plaintiff’s Complaint. (*See* Dkt. No. 18). On December 6, 2019, the Court dismissed Counts VIII, IX, X, XI, and XII of Plaintiff’s Complaint, and entered an Order requiring the completion of fact discovery by March 31, 2020 (*See* Dkt. No. 29).

2. Since then, the Parties have exchanged written discovery, supplemented their discovery, noticed the depositions of all fact witnesses, and taken several days of depositions.

3. On March 31, 2020, the Court entered an order extending the close of discovery by 21 days to April 21, 2020, pursuant to the Northern District of Illinois’ General Order responding to the public health concerns related to Covid-19. (*See* Dkt. No. 35).

4. The Parties plan to move forward with the remaining depositions and have been generally cooperative in utilizing remote conferencing options to conduct depositions to the extent they are available. However, despite the Parties' diligence and cooperative efforts, the Parties do not expect to complete party depositions by the current April 21, 2020 cut-off.

5. The Parties agree that an extension of fact discovery to May 21, 2020 is reasonable and will give the Parties an opportunity to address any existing technological issues associated with remote conferencing or complete the depositions when the potential risks to public health associated with in-person contact are lower.

6. This motion is made in good faith and not for purpose of delay. No party shall be prejudiced nor shall the administration of justice be unduly delayed by the extension jointly requested by the Parties.

WHEREFORE, the Parties respectfully request that the end of fact discovery be extended by 30 days to May 21, 2020.

Dated: March 27, 2020

Respectfully submitted,

LISA L. BREWER

By: /s/ Ellen Yearwood
Plaintiff's Attorney

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**PC CONNECTION, INC., d/b/a
CONNECTION, a Corporation,
GARY HICKERSON, JEFF
HIROMURA, ED TUCKER,
CRAIG LANCE, and RICK
GILLIGAN**

By: /s/ Gregory H. Andrews
One of Their Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on March 27, 2020, he caused a true and correct copy of the foregoing **JOINT MOTION TO EXTEND CLOSE OF FACT DISCOVERY** to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system.

/s/ Gregory H. Andrews